Air Quality Permitting
Technical Analysis

July 2, 2003

Tier II Operating Permit No. T2-000033

C. Wright Construction, Inc., Meridian, Idaho

AIRS Facility No. 001-00119

Prepared by:

Robert Baldwin, Permit Writer
Boise Regional Office

Bill Rogers, Regional Permit Program Coordinator
State Program Office

FINAL PERMIT

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
Department	Department of Environmental Quality
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per nour
MACT	Maximum Available Control Technology
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO_X	nitrogen oxides
NSPS	New Source Performance Standards
PERF	portable equipment relocation form
PM, PT	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
SIP	State Implementation Plan
SM	synthetic minor
SO_2	sulfur dioxide
T/yr	Tons per year
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.400 et seq, *Rules for the Control of Air Pollution in Idaho* for Tier II operating permits.

2. PROJECT DESCRIPTION

This project is for the issuance of a Tier II operating permit for C. Wright Construction, Inc. (C. Wright) located in Meridian. The emissions sources are:

- Mining activities
- Sand and gravel processing (crushing, screening, conveying)
- Stockpiles
- Hot-mix asphalt plant
- Paved and unpaved road traffic

3. FACILITY DESCRIPTION

C. Wright mines river deposits for sand and aggregate production. C. Wright sells river deposits and sand and aggregate to the general public, and uses processed (crushed, screened) sand and aggregates in a hot-mix asphalt plant to produce asphaltic concrete. Emissions from the facility are primarily fugitive dust; however, additional emissions include combustion product emissions from the natural gas-fired hot-mix asphalt burner, and process emissions associated with hot-mix asphalt production. Electrical power for crushers, conveyors, etc. is supplied by the local utility. This facility's potential to emit is being limited as part of the Northern Ada County PM_{10} Maintenance Plan.

4. SUMMARY OF EVENTS

On February 18, 2000, DEQ issued C. Wright a certified letter informing them they are required to obtain a Tier II operating permit as part of the Northern Ada County PM_{10} Maintenance Plan. The DEQ received C. Wright's Tier II operating permit application February 9, 2001. A proposed Tier II operating permit was provided for public comment from November 14 through December 14, 2001. Comments were provided by C. Wright and Stoel Rives, attorneys for C. Wright.

5. PERMIT HISTORY

This permit is the facility's initial air quality permit.

6. TECHNICAL ANALYSIS

6.1 Emissions Estimates

C. Wright's emissions are primarily fugitive, except for the emissions associated with hot-mix asphalt production and combustion product emissions. Emission factors from EPA's AP-42 were used to estimate emissions from crushing, screening, conveying, transfer points, stockpiles, haul roads (paved and unpaved), and hot-mix asphalt production. Activities associated with these processes include the following:

- Crushing
- Screening
- Conveying
- Transfer points
- Active stockpiles
- Inactive stockpiles
- Truck loading
- Front-end loader activities
- Bulldozer activities
- Drum-mix, hot-mix asphalt plant (hot plant)
- Vehicle traffic (paved and unpaved roads)

Bob Baldwin, DEQ Boise Regional Office, estimated emissions from these various processes using a spreadsheet. The spreadsheet is included as Appendix A of this document.

The facility's (mining, sand and aggregate production, and hot-mix asphalt production) uncontrolled potential to emit PM_{10} was estimated to be 2,200 T/yr. Taking into account the inherent moisture content of the river deposits, the addition of water or other dust suppressants during crushing, screening, transferring, and stockpiling activities led to a controlled PM_{10} potential to emit of 31 T/yr for the mining and sand and aggregate processing activities. The total throughput associated with this emission rate is 729,000 T/yr of mined river deposits, of which, 461,000 T/yr can be processed into sand and aggregate.

Using emission factors from AP-42, the uncontrolled potential to emit PM_{10} was 23.3 lb/hr. This value was input to the model used for the maintenance plan and compliance was not demonstrated. Subsequently, the permittee conducted a source test to measure PM_{10} emissions to see if actual emissions are less than those predicted or estimated using AP-42. During the test, the short term PM_{10} emissions rate was 4.86 lb/hr, much less than estimated. The actual emission rate (4.86 lb/hr) was input into the model and compliance was demonstrated for the maintenance plant. Because the hot plant was running near capacity when tested, C. Wright agreed to have the measured short term emission rate as their allowable emission rate in the permit. C. Wright indicated in their public comment that they would be comfortable with a hot-mix asphalt production limit of 50,000 T/yr. Assuming the hot plant emitted PM_{10} at a rate of 4.86 lb/hr, annual PM_{10} emissions associated with 50,000 T/yr of asphalt is 1.14 T/yr.

6.2 Modeling

Modeling was conducted by DEQ using emission estimates generated by the spreadsheet developed by Bob Baldwin, DEQ. Modeling predicts compliance with applicable ambient air quality standards for the maintenance plan.

6.3 Area Classification

C. Wright is located in Ada County, AQCR 64, Zone 11. Northern Ada County is classified attainment or unclassifiable for all criteria air pollutants.

6.4 Facility Classification

This facility is not a major facility as defined by IDAPA 58.01.01.006.55 or IDAPA 58.01.01.008.14. The facility is not a designated facility as defined by IDAPA 58.01.01.006.27. The facility is not subject to federal NESHAP, or MACT requirements. The facility's cone crusher is subject to federal NSPS requirements in accordance with 40 CFR 60, Subpart OOO. The facility's potential to emit is limited by restrictions placed on operating parameters. Emissions are limited below major source threshold levels; therefore, the facility classification is SM.

6.5 Regulatory Review

The following rules and regulations were review for this permitting action:

• IDAPA 58.01.01.401	Tier II Operating Permit
• IDAPA 58.01.01.403	Permit Requirements for Tier II Sources
• IDAPA 58.01.01.404.01(c)	Opportunity for Public Comment
• IDAPA 58.01.01.404.04	Authority to Revise or Renew Operating Permits
• IDAPA 58.01.01.406	Obligation to Comply
• IDAPA 58.01.01.470	Permit Application Fees for Tier II Permits
• IDAPA 58.01.01.625	Visible Emission Limitation
• IDAPA 58.01.01.650	General Rules for the Control of Fugitive Dust
40 CFR 60, Subpart OOO	Standards of Performance for Nonmetallic Mineral Processing Plants
• 40 CFR 60, Subpart I	Standard of Performance for Hot-Mix Asphalt Plants

7. PERMIT REQUIREMENTS

7.1 Fugitive Dust - IDAPA 58.01.01.650-651

Permit Condition 2.1 requires that all reasonable precautions be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

Compliance Demonstration

Permit Condition 2.2 requires the permittee to monitor and maintain records of the frequency and the methods used to reasonably control fugitive dust emissions.

Permit Condition 2.3 requires that the permittee maintain a record of all fugitive dust complaints received, and to take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint.

Permit Condition 2.4 requires that the permittee conduct weekly facility-wide inspections of all potential sources of fugitive emissions, and to monitor and record the results of each inspection.

Permit Condition 2.5 requires that no fugitive emissions be observed crossing the facility boundary.

7.2 Control of Odors - IDAPA 58.01.01.775-776

Permit Condition 2.6 requires that the permittee be in compliance with IDAPA 58.01.01.776.

Compliance Demonstration

Permit Condition 2.7 requires the permittee to maintain records of all odor complaints received, and to take appropriate corrective action as expeditiously as practicable.

7.3 Visible Emissions - IDAPA 58.01.01.625

Requirement

Permit Condition 2.8 requires that visible emissions from any point of emissions not be discharged to the atmosphere for more than three minutes in any 60-minute period.

Compliance Demonstration

Permit Condition 2.9 requires that the permittee conduct weekly facility-wide inspections of all potential sources of visible emissions, and to monitor and record the results of each inspection.

7.4 Excess Emissions – IDAPA 58.01.01.130-136

Requirement

Permit Condition 2.10 requires the permittee comply with the requirements of IDAPA 58.01.01.130-136 for startup, shutdown, scheduled maintenance, safety measures, upset, and breakdowns.

Compliance Demonstration

The compliance demonstration is following the procedures for excess emissions as contained in IDAPA 58.01.01.130-136.

7.5 Open Burning – IDAPA 58.01.01.600-616

Permit Condition 2.11 requires that the permittee comply with IDAPA 58.01.01.600-616.

Compliance Demonstration

Comply with the requirements of IDAPA 58.01.01.600-616.

7.6 Test Methods – IDAPA 58.01.01.157

Should performance testing be required, Permit Condition 2.12 lists the EPA approved reference test methods for the pollutants listed. Deviations from approved test methods must be approved in by DEQ in advance of conducting any test or the test results may not be accepted.

7.7 Air Stagnation Advisory Days

Permit Condition 2.13 requires the permittee comply with IDAPA 58.01.01.550-562.

7.8 Monitoring and Recordkeeping

Permit Condition 2.14 specifies how the permittee is to record and maintain all monitoring required by the permit, and the frequency of record retention.

7.9 Reports and Certifications

Permit Condition 2.15 requires that prior to relocation of any equipment covered by the permit, the permittee submit a relocation form (PERF) at least 10 days before relocating.

7.10 Fuel-Burning Equipment – IDAPA 58.01.01.675

Permit Condition 2.17 limits PM emissions from the hot plant burner, the only fuel-burning equipment. Because natural gas is the only fuel used, the only applicable standard is that for gas, 0.015 gr/dscf corrected to 3% oxygen by volume. As a side note, the PM measured during the source included the PM emitted from combustion.

7.11 Hot – Mix Asphalt Plant

PM_{10} Emissions Limits

Permit Condition 3.3 limits PM_{10} emissions based the results of an October 8, 2002 PM_{10} performance test. Annual PM_{10} emissions are limited based on the requested throughput limit.

Compliance Demonstration

Hourly throughput does not have to be limited to protect an ambient standard because the measured PM_{10} emission rate demonstrates compliance when modeled. Compliance with the annual emission rate limit is demonstrated by not exceeding the asphalt throughput limit of 50,000 T/yr.

7.12 Associated Process Emissions

PM_{10} Emissions Limits

Process fugitive PM_{10} emissions were quantified and modeled for the purposes of the maintenance plan. The fugitive emissions limits are required to comply with the requirements of the maintenance plan.

Compliance Demonstration

Compliance with the PM_{10} emissions rate limits is presumed so long as the permittee complies with Permit Conditions 2.1 through 2.5.

7.13 Emissions Limits Summary

Table 7.1 SUMMARY OF EMISSION RATE LIMITS

C. Wright Construction, Meridian Emission Limits[a] – Hourly (lb/hr), and Annual[b] (T/yr)		
Source Description	**Hourly PM_{10}[c] Emissions (lb/hr)**	**Annual PM_{10}[c] Emissions (T/yr)**
Asphalt Plant	4.84	1.14
All associated process emissions (fugitives included)	NA	31

[a] As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

[b] As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

[c] Includes condensibles.

7.14 Compliance Review

The hot-mix asphalt plant is not subject to 40 CFR 60, Subpart I because it was constructed prior to the effective date of the regulation (June 11, 1973) and has not been modified or reconstructed.

Any NSPS affected crusher cannot exhibit greater than 15% opacity in accordance with 40 CFR 60, Subpart OOO. Any NSPS affected transfer point on belt conveyors or any other affected facility cannot exhibit greater than 10% opacity in accordance with 40 CFR 60, Subpart OOO.

8. AIRS INFORMATION

Table 8.1 AIRS/AFS FACILITY-WIDE CLASSIFICATION[a] DATA ENTRY FORM

AIR PROGRAM / POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
SO_2	B	B				B	U
NO_x	B	B				B	U
CO	B	B				B	U
PM_{10}	SM	B				SM	U
PT (Particulate)	SM	B	SM			SM	U
VOC	B	B				B	U
THAP (Total HAPs)							
			APPLICABLE SUBPART				
			OOO				

[a] AIRS/AFS Classification Codes:

A Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.

SM Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.

B Actual and potential emissions below all applicable major source thresholds.

C Class is unknown.

ND Major source thresholds are not defined (e.g., radionuclides).

9. FEES

Fees **do not** apply to this facility in accordance with IDAPA 58.01.01.407 as per agreement for the facility's cooperation in obtaining a Tier II operating permit.

10. RECOMMENDATION

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue Tier II Operating Permit No. T2-000033 to C. Wright Construction, Inc. An opportunity for public comment was provided as required by IDAPA 58.01.01.404.01.c.

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APPENDIX A

Emission Spreadsheet

Results of Modeling Review

Summary of Source Test
On the Hot-mix Asphalt Plant

C. Wright Construction, Inc.
1320 South Black Cat Road
Meridian, Idaho 83642

Tim Wright, President
888-1307

		AP-42 Table 11-1.3 #/ton PM	Capacity 106 Tons/hr	PM is considered as PM-10 for worst case PM-10 #/hr						PM-10 Emissions
Hot Mix Asphalt Plant Natural Gas w/scrubber	50000		106	4.84						**2283**
Sand and Gravel Process including crushers, screens, conveyor drops	Thruput 461000				combined EF 0.0518					**23879.8**
	% silt	ave speed	ave weight	% moisture	Precip. Days	Day active	# of trips	dist./trip	% Control	Emission
Traffic Unpaved Roads	4.8	15	27.5	0.2	90	288	90	0.3	60	**7101.7**
Traffic Unpaved Roads	4.8	15	27.5	0.2	90	280	24	0.568	60	**3486.0**
	silt load									
Traffic Paved Roads	35		27.5		90	288	90	0.49	60	**10923.0**
Employee Cars	35		2.5		90	288	25	0.49	60	**83.2**
Front End Loaders (FEL)	4.8	5	22.64	0.2	90	288	211	0.05	60	**855.8**
FEL work area	4.8	5	22.64	0.2	90	288	211	0.05	0	**2139.4**
Wind Erosion									wind erosion	**6000.0**
				moisture	Wind					
FEL aggregrate handling				6	8.7					**402.0**
		hours/day	%motion			#/hr				
Dozer Traffic	6.9	10	50	6		288	1.106428			**1593.3**
						Total estimated pounds of PM-10 for 1999				**58747.0**
						Estimated tons of PM-10 for the year 1999				**29.4**
						Estimated tons of PM-10 for the sand and gravel process				**28.2**

Since the wetting factor of ((365-p)/365) is from the sky it could be reasonable to assume that it effects all outside road travel.
Thus I used it on paved, unpaved roads, FEL work area and FEL road travel.

From: MARY ANDERSON
To: ROBERT BALDWIN
Date: 6/19/03 3:34PM
Subject: Re: C. Wright Construction

Bob,

I just reran the model and 6am - 6pm scenario. It is ok. Here are the results

PM10 concentrations (H6H for 5 years of met data)

	facility	background	TOTAL
9590 acfm	50	90	140
18300 acfm	43	90	132

Mary Anderson
Air Quality Modeling Coordinator
Idaho Department of Environmental Quality
(208) 373-0202
(208) 373-0154 fax
manderso@deq.state.id.us

>>> ROBERT BALDWIN 06/12/03 12:15PM >>>
Mary,
You were going to review the work on C. Wright Construction to see if their permit to be written with restrictions would allow a 6 am to 6 pm operational day. Your first memo to me stated a 7am to 6 pm operational day. The company appears to agree with a 6 to 6 day. This took place within a week of your maternity leave.

Could you let me know if a 6 to 6 day will work, so I can finally get this permit done.

Thanks,
Bob
PS Hope you and family are all doing fine.

C. Wright Construction
Rotary Drum Mix Asphalt Plant
Air Quality Analysis

The purpose of this document is to report on the results of an air quality modeling analysis for a rotary drum mix asphalt plant, owned and operated by C. Wright Construction in Meridian, Idaho. The facility is currently in the process of obtaining an air quality permit and the Idaho Department of Environmental Quality (DEQ) is proposing that an air quality modeling analysis be conducted to ensure the facility meets National Ambient Air Quality Standards for particulate matter. The regulated pollutant in this case is particulate matter smaller than 10 micrometers in mass-mean diameter (PM10).

Initial attempts at air quality modeling were made by the DEQ using assumed emission factors for PM10 and estimated stack parameters. These modeling analyses indicated projected impacts from the facility would exceed ambient air quality standards when assumed to operate continuously. In an effort to refine the air quality modeling, C. Wright Construction retained Valid Results, an air testing firm, to conduct an emission source test at the facility. Emission testing using EPA test methods 1, 2, 3, 4, 5 and 202 was performed at the asphalt plant on October 8, 2002. The purpose of the current report is to document revised air quality modeling using the information obtained during these tests.

Full documentation on the emission source test is provided in Valid Results' source test report, dated October 20, 2002. Table 1 summarizes the results of the emission source tests. The most important result of the testing was the particulate matter emission rate, determined to be 13.98 pounds per hour. This includes the particulate matter emitted directly as particulate (front half), and the particulate matter condensed from vapors emitted by the facility (back half). Also note that this emission rate includes particles of all sizes, although only the particles smaller than 10 micrometers are of present regulatory interest. The testing did not quantify PM10 emissions directly, but the PM10 fraction of emissions can be estimated from EPA estimates of particle sizes. EPA's Compilation of Air Pollutant Emission Factors, known as AP-42, states that the PM10 fraction of total particulate is 23% (Table 11.1-2). Accordingly, the PM10 emission rate from the C. Wright Construction asphalt plant is (13.98 lb/hr)(0.23) = 3.22 lb/hr.

Air quality modeling was conducted using the Industrial Source Complex Short Term Version 3 Model (ISCST3). The ISCST3 model is recommended by EPA for evaluation of air quality impacts from industrial facilities such as the asphalt plant. It is the recommended model for this application in the EPA's Guideline on Air Quality Models, (40CFR, Appendix W). The DEQ used the ISCST3 model in their initial evaluation of the facility. MFG's analysis followed the DEQ's evaluation exactly, using the same meteorological data, the same receptors, and the same overall layout. The only differences between MFG's analysis and DEQ's analysis were as follows:

- The emission rate. MFG used 3.22 lb/hr (0.4051 g/sec) while the DEQ used 23.2 lb/hr (0.2923 g/sec).
- Stack base elevation. MFG used a stack base elevation of 2,598 feet (792 meters), while DEQ's modeling used 0.
- Stack exit temperature. MFG used 154 degrees F (341 degrees K), while DEQ used 150 degrees F (338.7 degrees K).
- Stack exit velocity. MFG used 68 ft/sec (20.7 m/sec), while DEQ used 50.9 ft/sec (15.5 m/sec).
- Stack diameter. MFG used 2.39 feet corresponding to an opening measured during the stack test of 24 inches by 27 inches, while DEQ used 2 feet (0.61 meters).

(Note: the combination of the last two factors results in a difference in flow rate from MFG's value of 18,300 ACFM versus the DEQ value of 9,590 ACFM.)

MFG further restricted the analysis to include only hours of daylight, since the asphalt plant does not operate at night. The restriction was accomplished by placing the following record in the source portion of the ISCST3 input file:

SO EMISFACT STACK1 HROFDY 0 0 0 0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 0 0 0 0 0 0

This record turns emissions from the asphalt plant off during the hours from midnight through 6:00 AM and again from 6:00 PM through midnight the next day.

The results of the modeling are depicted in Figure 1. Concentrations of PM10 were calculated for every 24 hour period in a full year of meteorological data from the Boise Airport and sorted to find the peak 24 hour average at each receptor. Peak values occurred on the hillside to the west of the plant and were computed by the ISCST3 model to be 34.0 micrograms per cubic meter (ug/m3). When added to the assumed worst-case background of 90 ug/m3, the peak impact is 124 ug/m3, less than the National Ambient Air Quality standard of 150 ug/m3.

Table 1. Summary of Emission Source Test Results					
Parameter	Units	Run 1	Run 2	Run 3	Average
Test Date		10/8/02	10/8/02	10/8/02	
Test Time		0812-0914	1007-1115	1215-1322	
Unit Load	ton asphalt/hr	81.2	81.2	81.2	81.2
Total PM Emission Rate	Lb/hr	16.243	12.774	12.937	13.98
Front Half Emission Rate	Lb/hr	13.89	10.96	10.69	11.85
Back Half Emission Rate	Lb/hr	2.35	1.81	2.25	2.13
PM10 Emission Rate[1]	Lb/hr	3.74	2.94	2.98	3.22
Stack Gas Flow Rate	ACFM	18,441	18,368	18,301	18,370
Stack Gas Moisture	%	13.77	13.61	13.77	13.69
Stack Gas Velocity	Ft/sec	68.3	68.03	67.78	68.04
Stack Temperature	Deg. F	153.9	157.2	151.1	154.1

[1]PM10 fraction estimated using AP-42, Table 11.1-2 and Total PM emission rate.

APPENDIX B

Public Comments and Department Responses

COMMENTS AND RESPONSES

STATE OF IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PUBLIC COMMENTS
SUBMITTED DURING A PUBLIC COMMENT PERIOD
FOR THE PROPOSED TIER II OPERATING PERMIT
FOR C. WRIGHT CONSTRUCTION, INC.

INTRODUCTION

The public comment period for the proposed Tier II Operating Permit for C. Wright Construction was held from November 14, 2001 to December 14, 2001. Comment packages were made available at the state office of the Department of Environmental Quality (Department) in Boise, the Department's Regional Office in Boise, and the Boise Public Library. The comment package consisted of the proposed Tier II Operating Permit and Technical Memorandum, and C. Wright Construction, Inc.'s 1999 Emission Inventory for Ada County.

Each public comment is presented below with the Department's comment immediately following.

Comments from Tim Wright, President, C. Wright Construction, Inc. (C. Wright)

Comment No 1:

Mr. Wright expressed concern to the limits imposed in the draft permit. He addressed concern about the modeling and requested the production limit of the hot-mix asphalt plant be raised to 50,000 tons per year.

Response to Comment No. 1:

Since receipt of Mr. Wright's comment, C. Wright has conducted a PM_{10} performance test on the hot-mix asphalt plant. The results of the test indicate emissions are much less than those estimated using EPA AP-42 emission factors. Consequently, the Department has revised the permit as requested. The revised throughput limit is now 50,000 tons of asphalt per year.

Comment No. 2:

Mr. Wright states the incorrect information has lead to the inaccurate decision of the hot-mix asphalt plant to be a NSPS source.

Response to Comment No. 2:

The Department concurs with C. Wright that the hot plant is not subject to NSPS requirements. The hot plant was constructed prior to the effective date of 40 CFR 60, Subpart I (June 11, 1973), not in 1975 as previously indicated in the Tier II permit application.

Comments from Stoel Rives, Attorneys for C. Wright Construction, Inc.

Comment No. 3

Comment No. 3 also questioned the Department's determination that the hot plant is subject to NSPS requirements.

Response to Comment No. 3:

Again, the Department concurs with both C. Wright and Stoel Rives concerning NSPS applicability. The hot plant was constructed prior to the effective date of the federal regulation and has not been modified or reconstructed; therefore, NSPS provisions do not apply.

The comments submitted during the public comment period are attached to this appendix.

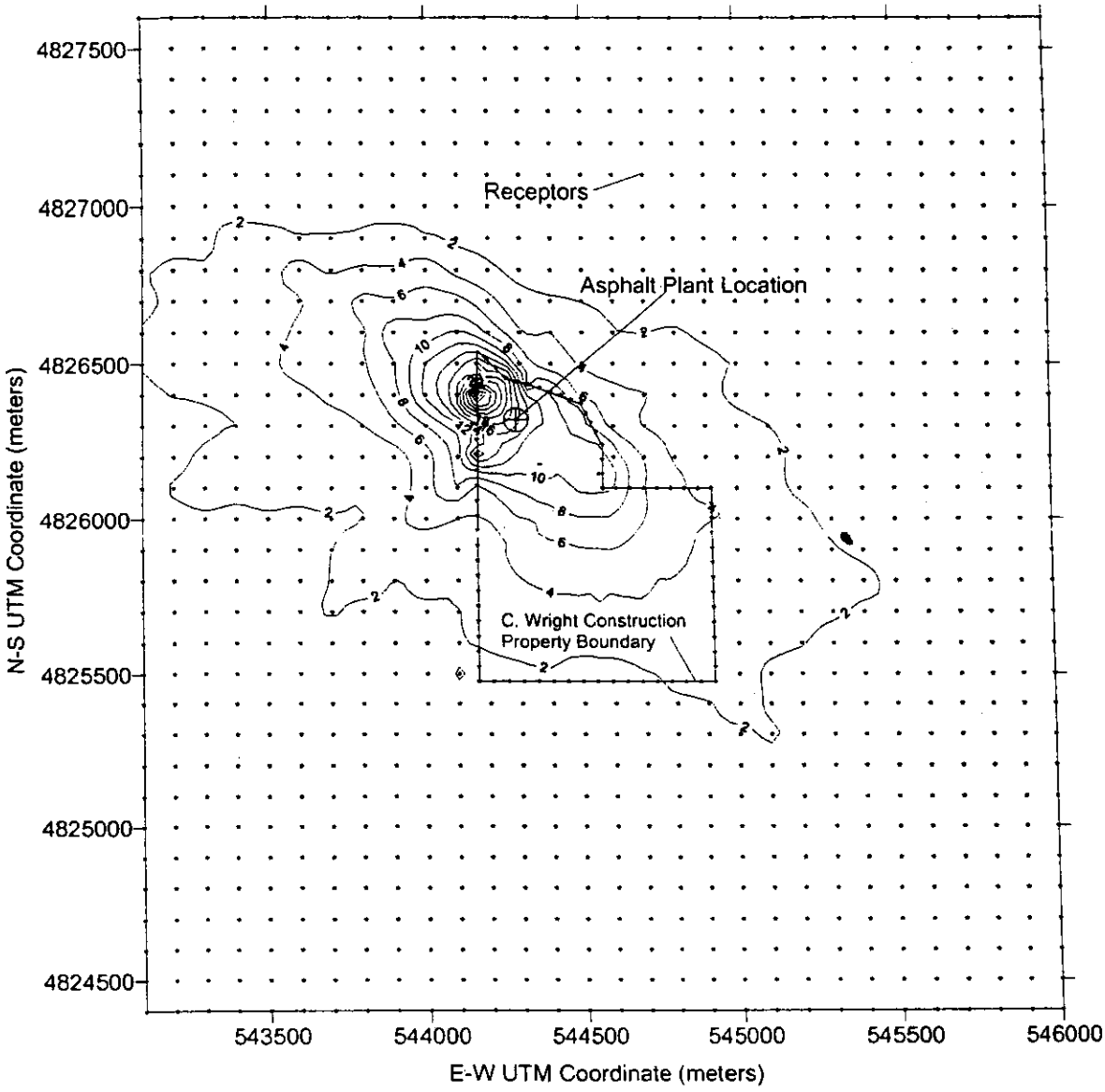

Figure 1. Isopleths of Peak 24-hour Average PM10 Concentrations in ug/m3